Serial No.:   09/820,589   **Office Action Date:** 4/6/2007
Filing Date.: 3/30/2001   **Amendment Date:** 7/6/2007

III.   AMENDMENTS TO THE DRAWINGS

None.

Serial No.: 09/820,589   Office Action Date: 4/6/2007
Filing Date.: 3/30/2001   Amendment Date: 7/6/2007

IV.   REMARKS/ARGUMENTS

Subsequent to the Office Action issued on 04/06/2007, claims 1-3 are pending in the
Application. Claims 1-3 stand rejected. Claim 3 has been amended to remove the word "by"
unnecessary for the claim. No new subject matter has been added to this application.
Reconsideration of Claims 1-3 is respectfully requested.

Claim Rejections – 35 U.S.C. § 102

The Office Action rejected claims 1-3 under 35 U.S.C. § 102(a) as being anticipated
by *O'Connor*, USPN 6,535,861. The Office Action implied that *O'Connor* taught all
elements of claims 1-3 with broad assertions that including that *O'Connor* teaches an
interactive training system that provides [a] scenario that defined a list of role[s] or task[s]
defined and explained to the trainee.

Applicants respectfully traverse this rejection. It is well settled that "[a]nticipation
requires the disclosure in a single prior art reference of each element of the claim under
consideration." *W.L. Gore & Assocs. v. Garlock, Inc.*, 220 USPQ 303, 313 (Fed. Cir. 1983),
cert. denied, 469 U.S. 851 (1984). And, "[a]bsence from the reference of any claimed
element negates anticipation." *Row v. Dror*, 42 USPQ 2d 1550, 1553 (Fed. Cir. 1997)
(quoting *Kloster Speedsteel AB v. Crucible, Inc.*, 230 USPQ 81, 84 (Fed. Cir. 1986)). Each
and every element of the claimed invention furthermore must be arranged as in the claim.
Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452,
1458 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is
contained in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d
1913, 1920 (Fed. Cir. 1989).

Serial No.: 09/820,589   **Office Action Date:** 4/6/2007
Filing Date.: 3/30/2001   **Amendment Date:** 7/6/2007

Applicants' specification discloses a learning aid that <u>integrates a business process</u> <u>and an application system</u> [para. 0001]. <u>An application tool is created to carry out a business</u> <u>process</u> the training is integrated into the system [para. 0009]. <u>The learning aid resides, in</u> <u>essence, as an integral part of the [business] process and software system</u> so that when rolled out to users, the process and application tool are accessible and support the user in learning the system [para 0020]. The business process learning aid includes functions for <u>assisting a</u> <u>user/learner in carrying out tasks</u> associated with completing the business process wherein the functions include a <u>task resource that assists the user/learner in performing a task within</u> <u>the process [para. 0007]</u>. The learning process includes such things as how to complete the actions required of a specific step in the business process before moving on to the next step [para 0024]. <u>User/learner[s] are assisted in completing a task within the process</u> to achieve a desired result [para 0028]. <u>User/learner[s] reference the learning resource site while</u> <u>conducting activities with an actual [business process]</u> for guidance and to switch between learning and using at any time [para 0029].

Therefore, in accordance with claims 1-3, a process learning aid comprises, *inter alia*, an <u>integrated tool</u> including a model of a business process wherein the <u>business process</u> <u>includes stages defined by a series of roles and tasks linked to an application system</u> . . . wherein the business process defines the progression of information by the series of roles and tasks. The <u>series of roles and tasks of the business process is supported by guidance from the</u> <u>integrated tool</u> wherein selected portions of the integrated tool are accessed. Steps of the business process are identified and defined in the model. Claims 1 and 2 further recite the application system defined by an interface, content and scenarios wherein a scenario <u>provides</u> <u>instruction through the content which defines the roles and demonstrates the actions</u> <u>necessary to complete the tasks</u> through at least one of graphical, audio or textual materials

GMC5111   Page 7 of 11

via the interface. Claim 3 additionally recites a task scenario including an <u>action scenario</u> <u>that demonstrates an action type required by the business process</u> [wherein] the action scenario [provides] guidance through graphical, audio or textual materials via an interface.

Applicants respectfully traverse any rejection of claims 1-3 under 35 U.S.C. § 102(b) in view of *O'Connor* because *O'Connor* fails to disclose each and every element of the arranged as in the claims. Specifically *O'Connor* fails to teach or describe a process learning aid as set forth in the claims comprising <u>an integrated tool</u>, guidance from which <u>the series of</u> <u>roles and tasks of the business process is supported</u>, and, wherein <u>actions necessary to</u> <u>complete the tasks are demonstrated</u> (claims 1 and 2) or <u>action types required by the business</u> <u>process are demonstrated</u> (claim 3).

The invention is distinguishable from *O'Connor*, in that *O'Connor* merely teaches a system that provides a goal based learning system utilizing rule-based expert training system to provide a cognitive educational experience. This includes a <u>simulated environment,</u> including a robust business model which provides support for realistic activities and allows a student to experience real world consequences for their actions and decisions. *O'Connor* describes the background for having a <u>simulated environment</u> in detail, e.g., the specification at Col. 12, Line 66 through Col. 13, Line 24. There is no integrated nexus to a business process and hence <u>no teaching or description of a process learning aid that comprises an</u> <u>integrated tool from which the business process is supported and tasks are completed</u>.

For at least this reason, Claims 1-3 are distinguishable from *O'Connor*, and therefore allowable.

Serial No.:   09/820,589   **Office Action Date:** 4/6/2007
Filing Date.: 3/30/2001   **Amendment Date:** 7/6/2007

Claim Rejections – 35 U.S.C. § 103

Claims 1 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *McMenimen*, USPN 6,514,079 in view of *Judd*, USPN 5,602,982. It was stated that *McMenimen* and *Judd* teach all the elements of claim 1, and it was stated that it would have been obvious to combine the teachings of *McMenimen* and *Judd*.

Applicants respectfully traverse any rejection of claim 1 under 35 U.S.C. § 103(a) over *McMenimen* in view of *Judd*, because *McMenimen* and *Judd* together fail to teach or describes all elements of applicants' claim 1, as is required under the law. Specifically, *McMenimen* and *Judd*, alone or in combination, fail to teach or describe a process learning aid comprising <u>an integrated tool,</u> guidance from which the business process is supported, and from which tasks are completed.

McMenimen merely teaches an interactive multimedia teaching for demonstrating and teaching occupational skills to a trainee. There is no integrated nexus to a business process and hence <u>no teaching or description of integrating the learning tool into the business process,</u> as recited in applicants' claim 1. *Judd* is solely concerned with application (i.e. software) training and merely sets forth a training and testing system which runs concurrently with a software application, to show a user how to perform application functions. There is no integrated nexus to a business process and hence <u>no teaching of a process learning aid comprising an integrated tool, guidance from which the business process is supported and from which tasks are completed,</u> as recited in applicants' claim 1.

Thus, claim 1 is distinguishable from *McMenimen* in view of *Judd*, and therefore allowable.

Claim 3 is distinguishable from *McMenimen* in view of *Judd* for the same reasons as set forth with regard to Claim 1, and is therefore allowable.

GMC5111   Page 9 of 11

Claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *McMenimen*, in view of *Judd*, and further in view of *Rice*, USPN 5,788,504. It was stated that *McMenimen, Judd,* and *Rice* teach all the elements of claim 2, and it was stated that it would have been obvious to combine the teachings of *McMenimen, Judd,* and *Rice* to allow the system to enable the trainee to be trained in all aspects of his/her responsibilities.

Applicants respectfully traverse any rejection of claim 2 under 35 U.S.C. § 103(a) over *McMenimen* in view of *Judd*, and further in view of *Rice*, because *McMenimen, Judd* and *Rice, Judd* together fail to teach or describes all elements of applicants' claim 2, as is required under the law. Specifically, *McMenimen, Judd,* and *Rice*, alone or in combination, fail to teach or describe a process learning aid comprising <u>an integrated tool,</u> guidance from which the business process is supported, and from which tasks are completed. The disclosures of *McMenimen* and *Judd* have been previously described. *Rice* sets forth a Computerized Training Management System for providing a procedurally defined process that is employed to develop accreditable performance based training programs, and comprises a database that links information needed to maintain a five-phase systematic approach to performance-based training. There is no integrated nexus to a business process and hence <u>no teaching of an integrated tool, guidance from which the business process is supported, and from which tasks are completed,</u> as recited in applicants' claim 2.

Thus, claim 2 is distinguishable from *McMenimen* in view of *Judd*, and further in view of *Rice*, and therefore allowable.

Conclusion

Based on the above, it is respectfully submitted that Claims 1-3 are in condition for allowance and Applicants request that same be allowed to proceed to issue.

GMC5111   Page 10 of 11

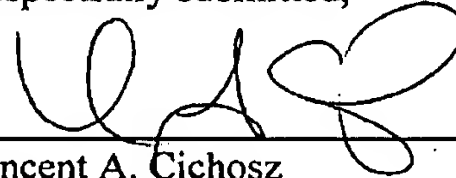**RECEIVED**

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Serial No.: 09/820,589
Filing Date.: 3/30/2001

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Amendment Date: 7/6/2007

The Examiner is encouraged to contact the undersigned attorney at the phone number

appearing below if any questions remain subsequent to considering the present response.

Any fees associated with this response may be charged to General Motors Deposit

Account No. 07-0960.

Respectfully submitted,

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